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BJP/hs

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ANTOINE JOHNSON,

Plaintiff,

INTERROGATORIES

-against-

08 Civ. 1324 (KMK)
ECF CASE

ALFRED MASTARRIGO,

Defendant.

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**DEFENDANT'S FIRST
INTERROGATORIES TO PLAINTIFF**

Pursuant to Rules 33 and 34 of the Federal Rules of Civil Procedure and Local Rule 33.3, defendant, ALFRED MASTARRIGO, hereby requests that plaintiff serves upon the undersigned attorneys sworn answers to the interrogatories set forth below within thirty (30) days of service hereof:

1. The names and addresses of witnesses with knowledge and/or information relevant to the subject matter of this action.
2. State the manner of computation of each category of damage alleged.
3. The existence, custodian, location and general description of relevant documents and other physical evidence, or evidence of a similar nature.

4. With respect to the injuries alleged suffered, state:

(a) the extent and nature of any disability, including those alleged to be permanent and those alleged to be aggravated.

(b) describe in detail the location of any pain suffered, and the duration and intensity of such pain.

(c) Whether or not you suffered any restraint of your normal activities due to the injuries allegedly suffered, and describe in detail the nature of such restraint, and the dates you suffered the pain.

5. Have you sustained any additional financial loss as a result of the incident complained of, other than those covered by preceding interrogatories: If so, state:

(a) the nature and amount of such losses.

(b) the date thereof.

(c) the name and address of any persons to whom any money so claimed as an additional loss was paid.

6. Set forth fully each and every act and/or omission constituting the negligence claimed on the part of the answering defendant.

7. State in what respect plaintiff has sustained a serious injury, as defined in Section 5102 of the Insurance Law, or economic loss greater than basic economic loss, as defined in Section 5102 of the Insurance Law.

Dated: White Plains, New York
July 15, 2008

LAW OFFICE OF THOMAS K. MOORE

By: _____ s/
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